

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Revision of the Commission's Rules)
to Ensure Compatibility with)
Enhanced 911 Emergency)
Calling Systems)
_____)

CC Docket No. 94-102

DOCKET FILE COPY ORIGINAL

To: The Commission

OPPOSITION TO PETITION FOR PARTIAL RECONSIDERATION

Pursuant to Section 1.429(f) of the Commission's Rules, L/Q Licensee, Inc. (LQL), hereby opposes the Petition for Partial Reconsideration filed by the United States Coast Guard in the above-referenced docket.¹ In its Petition, the Coast Guard requested that the Commission reconsider the decision to exclude Mobile-Satellite Service (MSS) systems from compliance with the Enhanced 911 requirements imposed upon other wireless carriers. See Report and Order, ¶ 83. LQL holds an authorization to construct, launch and operate Globalstar™, a low-earth orbiting mobile-satellite system in the MSS Above 1 GHz Service,² and, therefore, has a substantial interest in the service requirements imposed upon MSS systems.

¹ See Report and Order and Further Notice of Proposed Rulemaking, FCC 96-264 (released July 26, 1996).

² See Order and Authorization, 19 FCC Rcd 2333 (Int'l Bur. 1995), aff'd, FCC 96-279 (released June 27, 1996).

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Consistent with the Commission's sound decision in the Report and Order, further consideration of the issues raised by the Coast Guard should be postponed until E911 capabilities can be economically and reasonably accommodated on MSS systems and, for global MSS systems, until international emergency service standards have been adopted. Accordingly, for the reasons outlined below, LQL urges the Commission to retain the exclusion for MSS systems.

First, several MSS systems, including Globalstar™, are quite far along in their development. The mandatory addition of E911 calling capabilities would be complex and expensive to design and implement for both space segment and terrestrial facilities. This would hinder the rapid introduction of new and enhanced MSS services that will provide substantial public interest benefits.³ While E911 services are important to public safety, the Commission should not impose requirements on MSS systems which may significantly delay introduction of this new beneficial technology.

Second, MSS systems like Globalstar™ provide international service, and serve subscribers originating calls not only within but also outside the United States. If emergency service requirements are to be imposed upon global MSS systems, then they should be developed in an international forum which would allow the United States to take into account compatibility and consistency with international standards. Coordinating emergency requirements with other

³ See Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a Mobile Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Bands, 9 FCC Rcd 5936, ¶¶ 3-4 (1994).

countries would ensure that U.S. MSS licensees are not unduly burdened by a patchwork of national requirements imposed by many different countries. The Commission should work in the International Telecommunications Union to develop and adopt uniform emergency procedures, protocols and schedules for implementation for global MSS systems.

Third, through Globalstar™ and other MSS systems, the public will have access to a wide variety of services which can be used in emergencies, and which may not be available through terrestrial wireless services. For example, because MSS systems uplink to satellites rather than cell sites, fixed stations for emergency use could be placed at sites in remote areas where there is no landline or cellular telephone service. Or, when terrestrial telephone services are incapacitated due to a natural disaster, earth terminals associated with MSS systems terminals would continue to operate. These useful emergency services are within the current capabilities of MSS systems, even though they may not be feasible through terrestrial wireless technologies. It is not necessary for the Commission to impose the full array of E911 requirements on MSS to make these useful services available to the public.

In short, there is no justification for imposing E911 requirements on MSS systems at this time. The technologies and capabilities available in emerging technologies are different, and the services provided are distinct. The Commission should exploit this diversity by allowing new services to reach the public without imposition of costly technology which may not be appropriate for the stage of

development of an individual service. When international emergency call standards have been developed for global MSS systems, the Commission should decide whether to require E911 capabilities in future generations of MSS.

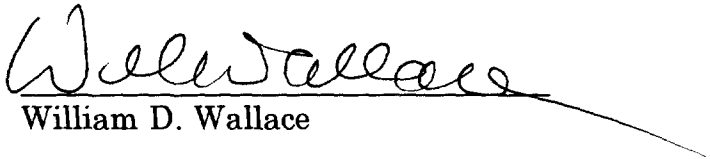
Respectfully submitted,

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CERTIFICATE OF SERVICE

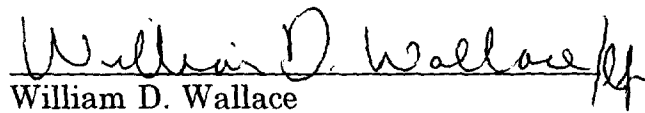
I, William D. Wallace, hereby certify that I have on this 8th day of October, 1996, caused copies of the foregoing Opposition to Petition For Partial Reconsideration to be delivered via hand delivery (indicated with *) or by U.S. mail, postage prepaid, to the following:

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